

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

DONALD FRIZELL,

Plaintiff,

v.

PEGASUS SCHOOLS, INC.

Defendants.

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C.A. NO. 1:11-cv-594

**JURY DEMANDED**

**MOTION TO WITHDRAW**

The undersigned attorney requests this Honorable Court to allow the withdrawal of Jonathan Sandstrom Hill and Ross Law Group as attorneys of record for Plaintiff, Donald Frizell, in the above entitled and numbered cause and, in support thereof, shows:

Kell Simon was the lead attorney for this case while he was employed by the Ross Law Group. On or around March 30, 2012, Kell Simon left the Ross Law Group and is now employed with the law firm of Terry, Simon & Kelly, PLLC, 701 Brazos Street, Suite 500-52, Austin, Texas 78701; Telephone 512-391-1955. Plaintiff consented to Kell Simon continuing in his capacity as Plaintiff's counsel of record and releasing the Ross Law Group, which includes Jonathan Sandstrom Hill, from further responsibility for this case. *See* Exhibit A, April 2, 2012 Consent Letter executed by Plaintiff, Donald Frizell.

Based on the foregoing, the undersigned respectfully requests that this Court enter an Order granting the withdrawal of Jonathan Sandstrom Hill and the Ross Law Group as attorneys of record for the Plaintiff in this action.

Respectfully submitted,

**ROSS LAW GROUP**  
1104 San Antonio St.

Austin, Texas 78701  
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/S/ JONATHAN SANDSTROM HILL

Jonathan Sandstrom Hill  
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I conferred with Defendant's attorney of record concerning the foregoing Motion and she does not oppose this Motion.

/S/ JONATHAN SANDSTROM HILL

Jonathan Sandstrom Hill

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of June, 2012, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Stephanie O'Rourke  
Cokinos, Bosien & Young  
10999 IH-10 West, Suite 800  
San Antonio, Texas 78230

Kell A. Simon  
Terry, Simon & Kelly, PLLC  
701 Brazos Street, Suite 500-52  
Austin, Texas 78701

/S/ JONATHAN SANDSTROM HILL

Jonathan Sandstrom Hill